

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA**

<b>In Re:</b>	)	
	)	
<b>GILBERT T. ARNOLD,</b>	)	<b>Case No. 14-14465</b>
	)	
<b>Debtors.</b>	)	<b>Chapter 13</b>

**DEBTOR'S OBJECTION TO TRUSTEE'S MOTION TO DISMISS**

Debtor Gilbert T. Arnold, by and through his attorney of record, hereby objects to the Trustee's Motion to Dismiss his Chapter 13 case. In support thereof, Debtor alleges and states as follows:

1. On October 27, 2014, the Debtor filed a Petition under Chapter 13 of the Bankruptcy Code.
2. On January 29, 2015, this Court entered its Order Confirming Plan.
3. After confirmation, DEUTSCHE BANK NATL filed a claim in an amount greater than was scheduled and the payment of the referenced claim as filed would result in a plan term of 82 months.
4. Debtor filed his Motion to Modify Confirmed Plan, Request for Compensation with Brief in Support and Notice of Opportunity for Hearing on March 13, 2015. The Motion proposes a modification to render the Chapter 13 Plan feasible.
5. The Motion to Dismiss should be denied.

WHEREFORE, premises considered, Debtor respectfully requests this Court issue an Order Denying the Trustee's Motion to Dismiss.

Respectfully submitted,

/s Tearsa Storms Olson  
Tearsa Storms Olson OBA#30264  
Storms Law Office, PC  
2400 NW 23<sup>rd</sup> St., Suite 102  
Oklahoma City, OK 73107  
Telephone: (405) 582-0012  
Fax: (405) 212-4872  
Email: [tearsastorms@gmail.com](mailto:tearsastorms@gmail.com)  
Attorney for Debtor

**CERTIFICATE OF SERVICE**

This is to certify that on the **18th** day of **March, 2015**, a true and correct copy of the **Debtor's Objection to Trustee's Motion to Dismiss** [Document No. 22] filed on the **18th** day of **March, 2015** was forwarded via U.S. Mail, first class, postage prepaid, to the following:

All creditors on the attached mailing matrix.

/s/ Tearsa Storms Olson  
Tearsa Storms Olson, OBA# 30265

Label Matrix for local noticing  
1087-5  
Case 14-14465  
Western District of Oklahoma  
Oklahoma City  
Fri Mar 13 14:15:33 CDT 2015

Oklahoma Tax Commission  
Legal Division  
120 N Robinson Suite 2000W  
Oklahoma City, OK 73102-7801

USBC Western District of Oklahoma  
215 Dean A. McGee  
Oklahoma City, OK 73102-3426

American InfoSource LP as agent for  
T Mobile/T-Mobile USA Inc  
PO Box 248848  
Oklahoma City, OK 73124-8848

Andrew R Chilson  
609 S Kelly Ave Ste A-2  
Edmond OK 73003-5696

Bank of America  
PO Box 5170  
Simi Valley CA 93062-5170

DEUTSCHE BANK NATIONAL TRUST COMPANY  
c/o Bank of America, N.A.  
Attention: Bankruptcy Department  
Mail Stop CA6-919-01-23  
400 National Way  
Simi Valley, CA 93065-6414

Deutsche Bank National Trust  
200 Crescent Court Ste 1040  
Dallas TX 75201-2103

Kozeny & McCubbin LC  
609 S Kelly Ave Ste A-2  
Edmond OK 73003-5696

U.S. Trustee  
United States Trustee  
215 Dean A. McGee Ave., 4th Floor  
Oklahoma City, OK 73102-3444

Gilbert T Arnold  
2529 NW 38th Pl  
Lawton, OK 73505-1815

John T. Hardeman  
PO Box 1948  
Oklahoma City, OK 73101-1948

Tearsa Storms Olson  
Storms Law Office  
2400 NW 23rd St., Ste. 102  
Oklahoma City, OK 73107-2438

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)Bank of America, N.A. as servicer for DEUT

End of Label Matrix  
Mailable recipients 12  
Bypassed recipients 1  
Total 13